From: Moore, Gary

To: <u>Cassidey, LeRoy</u>; <u>Crawford, Beth</u>
Subject: Re: CES Status My Comments

Date: Thursday, November 13, 2014 8:34:17 AM

## Leroy:

VB610 was supposed to go to Lonestar VB618/640 was supposed to go to Veolia We need to get these gone.

## Gary Moore

Federal On-Scene Coordinator U.S. EPA Region 6 214-789-1627 cell 214-665-6609 office

moore.gary@epa.gov

From: Cassidey, LeRoy

Sent: Thursday, November 13, 2014 8:08 AM

**To:** Crawford, Beth; Moore, Gary **Subject:** RE: CES Status My Comments

Beth and Gary:

We have two other sludge boxes at the site. VB 25281 (VB 610) that we are holding. My understanding is that we are looking at other disposal options with Lonestar Ecology. VB 25322 (VB 618 and VB 640) is also ready for shipment.

LeRoy

From: Crawford, Beth

Sent: Thursday, November 13, 2014 7:31 AM

To: 'Moore, Gary'
Cc: Cassidey, LeRoy
Subject: CES Status

Gary,

Good morning, Here is an update as to where we stand with Veolia and the processing of the vac boxes:

Manifest	Date	Box # (original	Weight	Sulfur	Sodium	Mercury	CES
		/ shipped)	(manifest	(content	(content		approval
			1	1	1		
			received)	surcharge	surcharge		
				per LB)	per LB)		
000832676VES	10/23	VB25141/	38,000/	19.2%/	1.2%/	Within	10/29
		VB25333	19,720	\$0.12	\$0.035	Parameters	email
000832683VES	10/29	VB251842/	30,000/	51%/	1.07%/	Within	10/30
		VB25315	21,460	\$.030	\$0.035	Parameters	email
000832682VES	11/5	VB640& VB610/	28,000/	30.0%/	1.21%/	Within	11/5
		VB25287	26,800	\$0.18	\$0.035	Parameters	email
000832680VES	11/7	VB610, VB618,	28,000/				
		VB640/VB25206					
000832681VES	11/7	VB618/	28,000/				
		VB25251					
Pending pick-		VB639/					

up	VB25274			
Pending pick-	VB639/			
up	VB25341			
Pending pick-	VB633/			
up	VB25229			
Pending pick-	VB633/			
up	VB25242			

Veolia has confirmed that none of the loads received today have been completely processed yet. Due to the high sulfur content of the material it is going to take a bit to process, this we knew was a possibility at the beginning of the project. Veolia is supposed to be updating me later today with estimated completion dates for each box. They are also supposed to be getting with me on a pick-up dates for the 4 boxes we currently have onsite.

On another matter after I confirmed with Demita that Lonestar wanted the South Containment in a Vac Box she called back to say it has to be a **VAC TRUCK**. I will move forward with getting the manifest ready for review. Demita is also working on the non-hazardous water tank approvals. I will get an update on that today. On a side note I do have EQ out of Belleville, MI looking at data from the North and South Tank Farms to see if there is any way possible they can treat these organics via chemical oxidation. The naphthalene is a concern for them but they have asked for samples for treat study purposes. To be honest I'm not holding much hope but it doesn't cost us any money to explore the possibility.

I also need to tell you what type of analysis we need to run on the roll-off which contains floor scrapings. It is my understanding the roll-off contains sludge from Vac Box 620 which was non-hazardous as well as scrapings from the pond areas where the water was removed and placed into the sanitary sewer. If you are ok with using generator knowledge to confirm lead les less than 1.5 ppm I will say we can leave off TCLP metals and simply run the following: TCLP VOC, TCLP SVOC, TPH, TCL VOC and TCL SVOC. It could be our TPH results throw us into a Class 1 status assuming this material is non-hazardous. I don't see the need for PCB or pesticide analysis however I want you to be comfortable with signing off on that. Let me know if we need to discuss further.

Leroy has confirmed no free liquids in Vac Box 641. So I will adjust the Republic profile accordingly and we'll get that moving. I did receive your email about shipping as much as possible by 11/24. Please let me know if I have missed any action items otherwise I'll be in touch later today with updated information. Thanks,



## **Beth Crawford**

Scientist

Applied Science & Engineering

Federal Services

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